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ATTORNEYS FOR LESLIE PRITCHARD AND  
GALMOR FAMILY LIMITED PARTNERSHIP

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

IN RE:	§	
	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
	§	
Debtor.	§	
	§	
And	§	
	§	
GALMOR'S/G&G STEAM SERVICE,	§	CASE NO. 18-20210-RLJ-7
INC.,	§	
	§	
Debtor.	§	
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	§	
KENT RIES, TRUSTEE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. 19-2006
	§	
MICHAEL STEPHEN GALMOR,	§	
RANDY MARK GALMOR, LESLIE	§	
DONNETTE GALMOR PRITCHARD,	§	
TRACI MARIE GALMOR COLEMAN	§	
and GALMOR FAMILY LIMITED	§	
PARTNERSHIP,	§	
	§	
Defendants.	§	

**VERIFIED AGREED MOTION TO CONTINUE TRIAL  
AND TO EXTEND SCHEDULING ORDER**

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

COME NOW Leslie Pritchard and the Galmor Family Limited Partnership (the “Movants”) two of the defendants in this Adversary Proceeding commenced by Kent Ries, Trustee (the “Trustee”), and file this their *Verified Agreed Motion to Continue Trial and to Extend Scheduling Order* (the “Motion”), respectfully stating as follows:

1. The Trustee filed his original complaint commencing this Adversary Proceeding on August 30, 2019.

2. On October 3, 2019, the Court entered its standard scheduling order (the “Scheduling Order”), providing for a trial docket call on February 13, 2020 and trial the week of February 18, 2020.

3. The Trustee effectuated service of process on the Movants on or about October 4, 2019.

4. The Movants filed their answers on November 18, 2019.

5. By this Motion, and without opposition from the Trustee, the Movants respectfully request that the Court grant a continuance of approximately six (6) months, resetting the trial docket call for July, 2020, and extending all deadlines in the Scheduling Order to correspond to said new trial docket call.

6. The primary ground for the requested continuance and extension is that the current Scheduling Order does not give the Movants sufficient time to prepare their defense. The Trustee seeks a recovery of more than \$2.4 million, based on the word of the debtor. This will therefore be a factually intensive action, necessitating extensive discovery from the debtor and others to test the hundreds of individual alleged transactions aggregating to the \$2.4 million.<sup>1</sup> Yet, under the

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<sup>1</sup> As the Movants understand it, the debtor alleges that he advanced large sums to the defendants or paid from his personal funds many expenses that benefited the defendants, stemming several years and many individual transactions. There is no promissory note or other debt instrument that would make this case straight forward.

current Scheduling Order, under which discovery must be completed 45 days prior to the trial docket call, the Movants had very little effective ability to take discovery once they filed their answers, since they would have had to serve discovery by the end of November, 2019. Nor would they have had sufficient time to retain experts and to otherwise take discovery from third parties through subpoena.

7. Second, in late January, 2020, the Movants replaced their former counsel with the undersigned. While the undersigned has worked diligently to bring himself up to speed, he needs more time to fully understand the issues, and to then formulate an effective discovery and trial strategy. The undersigned reasonably believes that July, 2020, is the earliest date by which he can reasonably conclude discovery, potentially retain an expert, and prepare for trial.

8. Third, the undersigned has engaged in negotiations with the Trustee, which may resolve a large portion of this Adversary Proceeding (that portion that deals with the liquidation of the Galmor Family Limited Partnership at least). It would therefore promote judicial efficiency and the economy of the parties to afford all parties additional time to negotiate and potentially resolve as much of this Adversary Proceeding as they can.

9. This is the first request for a continuance in this Adversary Proceeding.

10. The relief requested in this Motion is agreed to by the Trustee.

11. This Motion is not filed for purposes of delay or litigation advantage, but rather so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the Movants respectfully request that the Court enter an order granting this Motion, resetting the trial docket call to July 2020, and resetting all deadlines in the Scheduling Order accordingly.

RESPECTFULLY SUBMITTED this 4th day of February, 2020.

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ Davor Rukavina  
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**ATTORNEYS FOR LESLIE  
PRITCHARD, and GALMOR FAMILY  
LIMITED PARTNERSHIP**

**VERIFICATION**

The undersigned, under penalty of perjury, hereby declares and verifies that the factual statements in this Motion are true and correct to the best of his knowledge and belief.

By: /s/ Davor Rukavina  
Davor Rukavina, Esq.

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that he discussed the relief requested herein with Kent Rise, the only other party (other than Traci Coleman) to have appeared in this Adversary Proceeding, and that Mr. Ries informed the undersigned that he agrees to said relief. The undersigned is in the process of being retained by Ms. Coleman and certifies that, although he does not yet represent her, she too agrees to said relief.

By: /s/ Davor Rukavina  
Davor Rukavina, Esq.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this the 4th day of February, 2020, true and correct copies of this document were electronically served by the Court's ECF system on parties entitled to notice thereof, including on Kent Ries, Trustee, and that, additionally, he e-mailed a copy of this Motion and of the proposed order on this Motion to Mr. Ries.

By: /s/ Davor Rukavina  
Davor Rukavina, Esq.